



State of Washington
DEPARTMENT OF FISH AND WILDLIFE

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Jeffrey Rodin, Federal On-Scene Coordinator
US EPA Region 10
1200 6th Ave, Suite 900 (ECL-116)
Seattle, WA 98101

Subject: WDFW comments on the Final Engineering Evaluation/Cost Analysis, Bremerton Auto Wrecking Landfill-Gorst Creek Site

Dear Mr. Rodin,

The Washington Department of Fish and Wildlife (WDFW) appreciates the opportunity to review and comment on the Final Engineering Evaluation/Cost Analysis (EE/CA), Bremerton Auto Wrecking Landfill-Gorst Creek Site.

The Bremerton Auto Wrecking Landfill is located in the upper watershed of Gorst Creek, one of the largest watersheds on the Kitsap Peninsula. Gorst Creek supports Chinook, coho and chum salmon as well as cutthroat and steelhead trout. Cutthroat have been observed directly downstream of the landfill by WDFW biologists, and habitat downstream of the SR3 culvert is suitable to support coho salmon spawning and rearing. The existing culvert under the landfill blocks upstream passage of fish and eliminates stream habitat that could be used by coho and cutthroat, as well as wildlife habitat. Failing slopes due to water running across the landfill result in sedimentation of stream gravels and distribution of manmade debris throughout the stream corridor. The biggest risk to downstream habitat is the potential failure of the highway due to debris buildup, which would be devastating for public safety and travel, as well as the habitat.

The removal actions listed as options in this document are intended to protect human health and the environment. However, the alternatives appear to focus on water quality protection, rather than also considering the impacts on fish habitat or fish life. There is little information in the study regarding how contaminants of ecological concern at the site might directly affect fish life. Also, no mention is made of the habitat impacts created by the ongoing physical presence of the landfill. As long as the landfill is located directly within the stream corridor, the continuing possibility of downstream habitat degradation or loss exists. There is also ongoing direct loss of habitat caused by the lack of fish passage through the landfill, severing all connection with the upper reaches of Gorst creek.

The recommended alternative is flawed in that it is a temporary repair to the contaminant issues. Alternative 4 (microtunneling and pipe jacking) does not solve the contaminant issues in the long term or any habitat issues at all. The culvert length and size make it extremely challenging to

maintain. All culverts eventually fail, even with maintenance, and will need replacement again (and again) into the future. A replacement culvert underneath the landfill will not remove the threat of future contamination or release of debris from the site.

We recommend that the landfill and the stream corridor be physically separated. This would be accomplished either by Alternative 2 (landfill excavation and disposal, and Gorst ravine restoration) or Alternative 3 (Gorst Creek re-alignment). While expensive, these are the only options that permanently address the contaminant issues. These alternatives also provide fish and wildlife improvements.

A Hydraulic Project Approval (HPA; RCW 77.55.021, WAC 220-110) administered by WDFW is required prior to the performance of construction activities that may use divert, obstruct, or change the natural flow or bed of waters of the state. Guidelines for fish passage can be found in the "Design of Road Culverts for Fish Passage" which can be downloaded here:

<http://wdfw.wa.gov/publications/pub.php?id=00049>. Other publications regarding fish passage and habitat protection that may be useful can be found under the Guidelines subheading at: <http://wdfw.wa.gov/publications/search.php?Cat=Habitat>. WDFW staff are available to discuss project design and will appreciate continued coordination with the process.

WDFW thanks you again for the opportunity to provide comments on the Final Engineering Evaluation/Cost Analysis (EE/CA), Bremerton Auto Wrecking Landfill-Gorst Creek Site. Please feel free to contact me with any questions you may have.

Sincerely,



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